

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

JERMAINE BILLIE

PLAINTIFF,

v.

CREDENCE RESOURCE
MANAGEMENT, LLC

DEFENDANT.

CASE NO: 2:25-cv-00861

MOTION FOR SANCTIONS

2025 JUN 11 AM 11:43

**PLAINTIFF'S MOTION FOR SANCTIONS AGAINST DEFENDANT'S
COUNSEL**

NOW COMES Plaintiff, Jermaine Billie, appearing pro se, and respectfully moves this Honorable Court, after newly discovered information, to impose appropriate sanctions against Defendant's counsel pursuant to Federal Rules of Civil Procedure 11. In support of this Motion, Plaintiff states as follows:

Background and Relevant Facts

1. On 6 June, 2025, Defendant's counsel filed a Motion for Extension of Time, representing to this Honorable Court that his vacation or leave of absence

begins on June 9, 2025.

2. However, after further research of information. On April 18, 2025, I (the Plaintiff) discovered an email from Defendant's counsel providing me with notification that his leave of absence actually begins on June 16, 2025, not June 9, 2025. The email is clearly titled "Jermaine Billie v Credence Resource Management," which confirms the Defendant's counsel had prior knowledge of this case and had knowledge of representation of the Defendant.
3. Defendant's counsel, in his Motion for Extension of Time, stated that its client "recently retained counsel." However, based on the email provided to Plaintiff by the Defendant's counsel on 18 April, 2025. The information submitted to the Honorable Court was false, misleading, and deceptive.
4. A true and correct copy of that email is attached as **Exhibit A** to my Supplemental Affidavit in Opposition to Defendant's Motion for Extension.

Basis for Sanctions

5. Defendant's counsel knowingly submitted a Motion containing statements that contradict the information he provided me in writing, which contains the South Carolina Supreme Court in its heading.
6. This misrepresentation appears intended to improperly and deceitfully obtain an unwarranted extension of time under FRCP 6 and LR 6.01, which prejudices my ability to prosecute my claims timely.
7. Such conduct violates Federal Rule of Civil Procedure 11, which prohibits filings made for improper purposes or containing false statements. These actions completely undermine the trust, myself, as a pro se litigant and a retired veteran with over 20 years of service, or any other citizen may have in the integrity of the

judicial system, should these actions be accepted or permitted.

8. Specifically, Defendant's counsel has:

- a. Presented factual statements to the Court he knew, or reasonably should have known, were false;
- b. Failed to correct the misrepresentation despite an obligation to do so; and
- c. Engaged in conduct that undermines the integrity of these proceedings, and lack of initiative to maintain integrity with this Honorable Court.

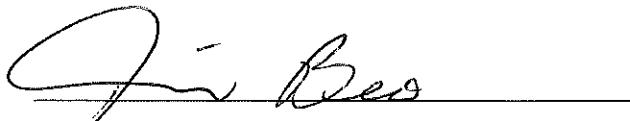
Relief Requested

9. Based on the foregoing and overwhelming evidence. I respectfully and prayerfully request this Honorable Court to:

- a. Maintain its integrity, fairness, and impartiality by imposing appropriate sanctions against Defendant's counsel for submitting false or misleading statements to the Court;
- b. Maintain its integrity, fairness, and impartiality by Vacating the Defendant's Motion for Extension of Time based on this misconduct;
- c. Award me, the Plaintiff, any costs or fees reasonably incurred in responding to Defendant's Motion for Extension and preparing this Motion for Sanctions;
- d. Plaintiff prayerfully requests to be awarded relief for statutory, actual, and punitive damages based on the information listed in Complaint, pursuant to 15 U. S. C § 1681n and 1681o; 15 U. S. C § 1692 et seq; and SCCPC 37 et seq; and
- e. Grant any other relief this Court deems just and proper, to include Default Judgement for the Defendant's failure to submit its Answer in accordance with the FRCP 12(a) and the abuse and misuse of FRCP Rule 6 and LR 6.01.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Motion and impose such sanctions or relief as it deems appropriate.

Respectfully submitted,



Jermaine Billie Pro Se

Date: 11 June, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of June, 2025, I served a true and correct copy of this Plaintiff's Motion for Sanctions and all attached exhibits upon counsel for Defendant by first-class mail and email, addressed as follows:

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